



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

**1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

MAY 18 2015

Ms. Abigail Low
GSA Project Manager
20 N. 8th Street
Philadelphia, PA 19107

Re: Final Environmental Impact Statement for U.S. Department of State Foreign Affairs
Security Training Center Nottoway County, Virginia (CEQ #20150112)

Dear Ms. Low:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement (FEIS) for U.S. Department of State (DOS) Foreign Affairs Security Training Center (FASTC) in Nottoway County, Virginia.

EPA recognizes that coordination is ongoing between the project planners and the US Army Corps of Engineers to acquire additional information on aquatic resource function, condition and appropriate mitigation. EPA is involved with this effort and appreciates the work being done. While the FEIS addressed EPA's comments on the Draft Supplemental Environmental Impact Statement (DSEIS), EPA would like to make comments and suggestions on the U.S. General Services Administration's (GSA) discussion of greenhouse gas emissions (GHG) and climate change issues within the EIS so that these suggestions can be incorporated into project development and documented in the Record of Decision (ROD). These comments and suggestions are contained in the attached Technical Comments document.

EPA appreciates the opportunity to have reviewed this project and to have worked with your staff during the NEPA process. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765 or delgrosso.karen@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Barbara Rudnick", is written over a horizontal line.

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs



Technical Comments

Green House Gas Emissions/Climate Change

In December 2014, the Council on Environmental Quality issued Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts for Federal agencies' consideration. The guidance outlines a reasonable approach to analyze greenhouse gas emissions and climate change impacts. The guidance can be found at:
<https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance> .

EPA has been tasked by its Headquarters' office to ensure that NEPA documents address the concern of GHG emissions and incorporate resiliency into project design. Although GSA has addressed GHG impacts in the EIS, EPA offers the following comments and suggestions to further refine the discussion and exemplify that which is expected in NEPA documents. It is recommended that GSA and DOS use the draft guidance to assist in project development and incorporate measures into the ROD, as appropriate.

The Affected Environment section, Section 3.2.2.1, page 3-48 states, "On a national scale, federal agencies are addressing emissions of GHGs by reductions mandated in federal laws and EOs enacted to address GHGs, including GHG emissions inventory, reduction, and reporting." Although correct, what is most expected of lead federal agencies in this section is a summary discussion of climate change and ongoing and reasonably foreseeable climate change impacts relevant to the Proposed Action.

Within the Environmental Consequences section, 4.1.1.1, page 4-1, a national comparison is used "...the 2012 United States (U.S.) GHG Inventory Report (USEPA 2014) estimates total CO_2e emissions at $5,546.3 \times 10^6$. The GHG emissions estimated for FASTC operations represent one ten thousandths of a percent." Please note that it is not recommended to compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a project level analysis. Rather, consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

Pages 4-1 and 5-14 state, "At present, no methodology exists that would enable estimating the specific impacts (if any) that this increment of warming would produce locally or globally." Although this statement may be accurate, it does not preclude GSA from incorporating ways to reduce GHG emissions into the Proposed Action. It is important for GSA/DOS to follow-up with a statement committing to implementation of design or other measures to reduce GHG emissions or to adapt to climate change impacts.

Finally, EPA appreciates your intention to incorporate Leadership in Environment and Energy Design (LEED) Silver standards into the design of the two largest buildings planned for the FASTC Core Area (A01 and T01) as well as low impact development (LID) measures. EPA

